



Air Quality Permitting Statement of Basis

December 15, 2003

Project No. T2-030064

J.R. Simplot Company, Nampa

Facility ID No. 027-00059

Prepared by:

**Bill Rogers
Regional Permit Program Coordinator
Air Quality Division**

Revised Tier II Operating Permit and Permit to Construct

TABLE OF CONTENTS

1. PURPOSE.....	4
2. SUMMARY OF EVENTS.....	4
3. TECHNICAL AND REGULATORY ANALYSIS.....	4
4. RECOMMENDATION	4
5. AIRS INFORMATION.....	5

ACRONYMS, UNITS, and CHEMICAL NOMENCLATURE

AIRS	Aerometric Information Retrieval System
CO	carbon monoxide
DEQ	Department of Environmental Quality
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
SO ₂	sulfur dioxide
T/yr	tons per any consecutive 12-month period
VOC	volatile organic compound

1. PURPOSE

The purpose for this document is to satisfy the requirements of the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200 et seq and IDAPA 58.01.01.400 et seq.

2. SUMMARY OF EVENTS

The J.R. Simplot Co. was issued Tier II Operating Permit and Permit to Construct No. 027-00059 on September 4, 2002, for their potato processing facility in Nampa. On the cover page of that permit, the facility was incorrectly classified as a synthetic minor (SM) facility. The facility's uncontrolled potential to emit is less than 100 T/yr; therefore, the correct AIRS facility classification is natural minor (B).

On August 28, 2003, DEQ received a written request from the J.R. Simplot Co. to change the AIRS facility number to correctly identify the facility as a natural minor facility.

3. TECHNICAL AND REGULATORY ANALYSIS

Based on review of the existing permit and technical analysis, it has been confirmed that the facility's uncontrolled potential to emit is less than 100 T/yr. The following table summarizes the facility's potential to emit.

J.R. Simplot Co. – Food Group, Nampa					
	PM10 (T/yr)	NO _x (T/yr)	CO (T/yr)	VOC (T/yr)	SO ₂ (T/yr)
Facility PTE	76.4	73.2	60.4	55.0	26.9

Because the permit contains on restrictions on operations that limit the facility's potential to emit and because the potential to emit is less than the major source trigger of 100 T/yr, the AIRS facility classification is B.

4. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that DEQ issued revised Tier II Operating Permit and Permit to Construct No. T2-030064 to the J.R. Simplot Co. for their Nampa potato processing facility. No entity has requested a public comment period and the project does not involve PSD permitting requirements.

BR/sd Permit No. T2-030064

G:\Air Quality\Stationary Source\SS Ltd\T2\Simplot Nampa\T2-030064 Permit SB.doc

5. AIRS INFORMATION

AEROMETRIC INFORMATION RETRIEVAL SYSTEM INFORMATION

Table B.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A - Attainment U - Unclassifiable N - Nonattainment
POLLUTANT							
SO ₂	B					B	U
NO _x	B					B	U
CO	B					B	U
PM ₁₀	B					B	U
PT (Particulate)	B					B	U
VOC	B					B	U
THAP (Total HAPs)	B					B	
			APPLICABLE SUBPART				

^aAerometric Information Retrieval System (AIRS) / AIRS Facility Subsystem (AFS)

^bAIRS/AFS Classification Codes:

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B = Actual and potential emissions below all applicable major source thresholds.

C = Class is unknown.

ND = Major source thresholds are not defined (e.g., radionuclides).